

Exhibit 56



August 22, 2024

Bonita L. Robinson
(212) 336-2554

By Email

Meredith Nelson, Esq.
Selendy Gay PLLC
1290 Avenue of the Americas
New York, NY 10104

Re: Addition of Paula Mighells as a Custodian
Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC,
Case No. 2:22-cv-02632 (JKS) (CLW)

Dear Meredith:

We write to request that SaveOnSP add Paula Mighells as a full custodian.

Ms. Mighells was a long-tenured SaveOnSP employee, working for the company from at least 2019 to at least mid-2023 as both a member services representative and a quality assurance auditor. In those roles, Ms. Mighells regularly [REDACTED]. Ms. Mighells also had significant responsibility for training other SaveOnSP personnel and for auditing SaveOnSP representatives' communications with members and manufacturers and identifying and addressing perceived problems with those communications. As such, her custodial documents are highly likely to contain documents and information that are responsive to JJHCS's existing discovery requests and that concern a number of subjects relevant to this litigation.¹

For example, SaveOnSP's productions to date demonstrate that throughout her tenure at SaveOnSP Ms. Mighells routinely encountered and recognized the harm caused to members by SaveOnSP's and its partners' conduct. *See, e.g.,* SOSP 0683762 ([REDACTED]); SOSP 1405368 ([REDACTED]); SOSP_0716137 ([REDACTED]); *see also* SOSP_2117807 ([REDACTED]).

¹ Given her roles at SaveOnSP, Ms. Mighells's custodial documents are likely to contain documents and information responsive to at least JJHCS's Request Nos. 5, 6, 7, 8, 10, 13, 23, 24, 28, 30, 33, 34, 53, 54, 77, 78, 79, 80, 93, 99, 119, 120, 121, 131, and 132.

Meredith Nelson, Esq.
August 22, 2024
Page 2

[REDACTED]). Documents and communications on this subject are central to JJHCS's GBL claim and clearly responsive to JJHCS's existing discovery requests. *See, e.g.*, Request Nos. 7, 8, 28, 30, 33, 34, 73, 77, 78, 93.

SaveOnSP's productions also show that Ms. Mighells regularly trained SaveOnSP personnel, as confirmed by dozens of recordings of team "Huddles" led by Ms. Mighells that SaveOnSP recently has produced. Ms. Mighells' instruction covered a wide variety of subjects, such as [REDACTED]

[REDACTED] Moreover, as one of SaveOnSP's most senior quality assurance auditors, Ms. Mighells [REDACTED]

Documents and communications on these subjects plainly are relevant to this case, as they shed light on (among other things) SaveOnSP's deception of both members and manufacturers and SaveOnSP's efforts to evade detection by manufacturers like JJHCS, and responsive to multiple JJHCS discovery requests. *See, e.g.*, Request Nos. 5, 6, 7, 8, 23, 28, 30, 34, 53, 54, 73, 77, 78, 79, 131, 132.

Finally, as we have previously discussed in the context of JJHCS's Twelfth Set of Request for Production, *see* June 25, 2024 Ltr. from B. Robinson to M. Nelson at 3; July 11, 2024 Ltr. from B. Robinson to M. Nelson at 2-3, Ms. Mighells is the obvious and most appropriate custodian for JJHCS's RFP No. 121, which seeks documents and communications regarding efforts by SaveOnSP to take adverse action against her. Ms. Mighells should be added as a custodian for this reason, as well.

Please confirm whether you will add Ms. Mighells as a custodian by Tuesday, August 27, 2024. To the extent you will not agree to add her as a custodian, please provide your availability any day next week to meet and confer.

Very truly yours,

/s/ Bonita Robinson
Bonita L. Robinson